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Hon. Paul A. Engelmayer
United States District Court
for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

May 14, 2024

**Re: Jane Street Group, LLC v. Millennium Management LLC, Douglas Schadewald,
and Daniel Spottiswood, No. 1:24-cv-02783**

Dear Judge Engelmayer:

I write on behalf of Defendants Douglas Schadewald (“Schadewald”) and Daniel Spottiswood (“Spottiswood,” and together with Schadewald, “Individual Defendants”). Pursuant to Individual Defendants’ Letter Motion to Seal (D.I. 73, so ordered at D.I. 76), Individual Defendants are filing today a public version of their Answer, Affirmative Defenses, and Counterclaims (“Answer and Counterclaims”) together with a sealed version with redacted portions reflected in highlighting.

All redactions reflected in today’s filings are requested by Plaintiff. Individual Defendants do not believe the proposed redactions are warranted by law. The proposed redactions do not constitute “trade secret or other highly confidential business information” sufficient to outweigh the heavy presumption of public access to the Answer and Counterclaims. *TileBar v. Glazzio Tiles*, 2024 WL 1186567, at *27 (E.D.N.Y. Mar. 15, 2024); *see also Under Seal v. Under Seal*, 273 F. Supp. 3d 460, 470 (S.D.N.Y. 2017) (weight of the presumption of public access to pleadings is “heavy”). In particular, Jane Street’s requested redactions to Individual Defendants’ Counterclaims (Answer and Counterclaims pp. 37-43) do not implicate any genuine competitive sensitivity, but conceal basic facts supporting the notion that Individual Defendants were objectively high-performing traders within Jane Street who left because Jane Street’s philosophy led them to look elsewhere to continue their careers (not a desire to sell Jane Street’s secrets to a competitor, as Jane Street has alleged).

Individual Defendants have conferred with Jane Street and advised that they do not believe the proposed redactions to the Answer and Counterclaims are warranted by law, and reserve the right to challenge the redactions proposed by Jane Street, and to later revise the redactions to the Answer and Counterclaims.

Respectfully submitted,

/s/ Brian R. Campbell

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